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Jeremiah W. (Jay) Nixon, Governor • Sara Parker Pauley, Director

DEPARTMENT OF NATURAL RESOURCES

www.dnr.mo.gov

October 6, 2015

CERTIFIED MAIL – 7009 3410 0001 8933 6895
RETURN RECEIPT REQUESTED

Mr. Tom Meitner
Environmental Division
Modine Manufacturing Company
1500 DeKoven Avenue
Racine, WI 53403-2552

RE: July 2015 Soil Vapor Investigation Summary
Former Modine Manufacturing Company (Modine), Camdenton, Missouri
EPA ID# MOD062439351

RECEIVED

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AWMD/WRAP IO

Dear Mr. Meitner:

On October 2, 2015, the Missouri Department of Natural Resources (Department) received the Soil Vapor Investigation Summary for the Soil Vapor Investigation conducted in July 2015 at the former Modine Manufacturing Company in Camdenton, Missouri. The results significantly exceeded EPA Regional Screening Levels for soil gas for trichloroethene (TCE). During the soil vapor investigation, a sanitary sewer line was identified that services both the former facility property and the residences along Mulberry Drive. The concentration of TCE at sampling location MD-SV07, which is located within 80 ft of the sanitary sewer line and 10 feet of a residential property, exceeded the EPA residential screening level for TCE by three orders of magnitude. This sanitary sewer line has the potential to serve as a preferential pathway for vapor migration to homes along Mulberry Drive. The Department is concerned that migration of vapors along the sewer line may impact indoor air quality in the homes along Mulberry Drive.

In accordance with Section IX, Additional Work, of Modine Manufacturing Company's Corrective Action Abatement Order on Consent, No. 99-HW-002, dated July 29, 1999, Modine Manufacturing Company shall submit for Department review and approval, a Work Plan addressing further investigation of potential indoor air, soil gas and sewer line impacts beyond the facility property boundaries. This may be submitted as an addendum to the *Quality Assurance Project Plan (QAPP), Indoor Air and Subslab Sampling – Modine Manufacturing Facility* (CH2M, 2013) and utilize the previously-approved sampling and analytical methods contained therein.

At a minimum, the Work Plan should include the following:

- A sampling and analysis plan that includes proposed sampling locations and depths and specific procedures to be used to collect and analyze the samples. The Sampling and Analysis Plan shall include investigation of the following:

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- a. Indoor air and sub-slab soil gas from all homes along Mulberry Drive and any other homes that may be connected to the sewer line.
 - b. Soil gas in the gravel subgrade along the sewer line along the length of Mulberry Drive.
 - c. Indoor air and sub-slab soil gas from the homes on Sunset Drive just north of the Facility.
- A map indicating the proposed sampling locations with respect to the former Modine facility, the residences on Mulberry Drive and Sunset Drive, the sewer line and known soil gas impacts.
 - An expedited schedule for implementing the work plan and submission of an Indoor Air, Soil Gas and Sewer Line Investigation Report. Sample results should be submitted to the Department as soon as they are verified by the contract laboratory.

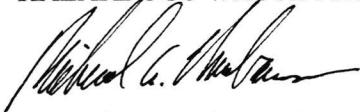
Access to the residences that may be susceptible to vapor intrusion should be obtained as soon as possible to ensure timely implementation of the investigation. In addition, please proceed with collecting the second round of soil vapor sampling from the eight established soil vapor sampling locations on the facility property. Specifically, efforts should be made to obtain valid samples from soil vapor sampling locations MD-SV02 and MD-SV06. A sample could not previously be obtained from MD-SV02 in July due to moisture in the tubing, and the sample collected from MD-SV06 failed the helium leak check.

Please submit three paper copies and one searchable electronic copy of the Work Plan within 15 calendar days of receiving this letter. If Modine anticipates not being able to meet this schedule, Modine must submit a written extension request and justification for the request to the Department at least 7 calendar days before the required submittal date.

If you have questions regarding this letter, please contact Christine Kump-Mitchell, P.E., Environmental Engineer, of my staff at the Missouri Department of Natural Resources, Hazardous Waste Program, 7545 South Lindbergh, Suite 210, St. Louis, MO 63125-4839, by telephone at (314) 461-2464 or 1-800-361-4827, or by e-mail at christine.kump@dnr.mo.gov. Thank you.

Sincerely,

HAZARDOUS WASTE PROGRAM



Richard A. Nussbaum, P.E., R.G.
Chief, Permits Section

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c: Christine Jump, L.G., Missouri State Coordinator, U.S. EPA Region 7 ✓
Ms. Monica Schneider, Project Manager, CH2M
Mr. Bob Macrum, Simmons Bank
Ms. Kathleen M. McFadden, Esq., United Technologies Corporation
Southwest Regional Office, Missouri Department of Natural Resources
Don Van Dyke, Missouri Department of Natural Resources

